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LAC-IEE-11-76

ENVIRONMENTAL THRESHOLD DECISION

Activity Location:	LAC Regional
Activity Title:	Improve Conservation of the Region's Biological Resources: Initiative for Conservation in the Andean Amazon (ICAA II)
Activity Number:	SO 22
Life-of-Activity Funding:	\$75 million
Life-of-Activity:	FY 2010 – FY 2016
IEE prepared by:	Connie Campbell, LAC/RSD/E
Reference Threshold Decision:	LAC-IEE-10-30, LAC-IEE-05-23
Recommended Threshold Decision:	Categorical Exclusion, Deferral
Bureau Threshold Decision:	Concur with Recommendation

Comments:

This Environmental Threshold Decision amends LAC-IEE-10-30 and LAC-IEE-05-23 to extend the activity's timeline through FY2016 to accommodate the implementation period of several ICAA II mechanisms extending through September of 2016. All of the SO objectives under ICAA II remain as stated in LAC-IEE-10-30, which determined a Categorical Exclusion and Deferral.

A **Categorical Exclusion** issued to the Latin America and Caribbean Regional Climate Change Program for the proposed staffing, technical assistance, regional studies analyses and workshops under SO 22, pursuant to 22 CFR 216.2 (c) (2):

- (i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);
- (iii) Analyses, studies, academic or research workshops and meetings;
- (xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.);


A **Deferral** is issued to all activities under the LAC Initiative for Conservation in the Andean Amazon (ICAA II) that are not categorically excluded from additional environmental review, and may cause adverse environmental impacts [see to 216.3(a) (7) (iii) Environmental Review After Authorization of Financing]. When these activities are better defined – at the time of approval of the procurement and/or approval of work plans in procured mechanisms – an IEE amendment will be submitted and an ETD issued for these activities before they can be implemented. The procurement mechanism(s) will specifically mention incorporation of environmental review and compliance with 22 CFR 216 in ICAA activity design.

Responsibilities

- Each activity manager or Contracting/Agreement Officer Technical Representative (COTR or AOTR) is responsible for making sure environmental conditions are met (ADS 204.3.4). In addition, COTRs and AOTRs are responsible for ensuring that appropriate environmental guidelines are followed, mitigation measures in the IEE are funded and implemented, and that adequate monitoring and evaluation protocols are in place to ensure implementation of mitigation measures.
- It is the responsibility of the Strategic Objective (SO) Team to ensure that environmental compliance language from the ETD is added to procurement and obligating documents, such as activity-related Strategic Objective Grant Agreements (SOAGs) and Modified Acquisition and Assistance Request Documents (MAARDs).
- The Mission Environmental Officer will conduct spot checks to ensure that conditions in the IEE and this ETD are met. These evaluations will review whether guidelines are properly used to implement activities under this ETD in an environmentally sound and sustainable manner according to USAID and applicable U.S. Government policies and regulations.
- The implementing contractor or partner will ensure that all activities conducted under this instrument comply with this ETD. Also, through its regular reporting requirements, a section on environmental compliance (e.g. mitigation monitoring results) will be included.

Amendments

- Amendments to Initial Environmental Examinations (IEE) shall be submitted for LAC Bureau Environmental Officer (BEO) approval for any activities not specifically covered in the IEE, which include:
 - Funding level increase beyond ETD amount,
 - Time period extension beyond ETD dates (even for no cost extension), or
 - A change in the scope of work, such as the use of pesticides or activities subject to Foreign Assistance Act sections 118 and 119 (e.g. procurement of logging equipment), among others.
- Amendments to IEEs include Environmental Assessments (EA or PEA) and approval of these documents by the LAC BEO could require an annual evaluation for environmental compliance.

 Date 09-23-2011
Victor H. Bullen
Bureau Environmental Officer
Bureau for Latin America & the Caribbean

Copy to: Lawrence Rubey, LAC/RSD, Office Director
Chris Cushing, LAC/RSD
Connie Campbell, LAC/RSD
Greg Lestikow, LAC/RSD

Copy to: Paul Schmidtke (REA CAM), Joe Torres (REA
CAR), Jason Girard (REA SA)

Copy to: IEE File

Attachment: Initial Environmental Examination Amendment

File: P:\LAC.RSD.PUB\RSDPUB\EES\Reg 216\IEE\IEE11\ LAC-IEE-11-76 ETD (LAC – ICAA II, amend LAC-IEE-10-30, 05-23).doc

INITIAL ENVIRONMENTAL EXAMINATION AMENDMENT

Activity Location	LAC Region
Activity Title	Improve Conservation of the Region's Biological Resources
Activity Number	SO 22
Life of Project Funding	\$75 million
Life of Project	FY 2010 – FY 2016
IEE Prepared by	Connie Campbell, LAC/RSD/E
Recommended Threshold Decision	Categorical Exclusion/ Deferral

Comments:

This is an amendment to the Initial Environmental Examination (IEE) for the Office of Regional Sustainable Development's Biodiversity Conservation Strategic Objective. The original IEE, LAC-IEE-01-32, determined a Categorical Exclusion and Negative Determinations and Supplemental IEEs, LAC-IEE-04-29, LAC-IEE-05-23, LAC-IEE-10-30 determined a Categorical Exclusion and Negative Determination with conditions.

The LAC Bureau is amending the Strategic Objective to extend the Objective's timeline through FY 2016 in order to accommodate an expansion of the Initiative for Conservation in the Andean Amazon (ICAA II).

This amendment extends the Objective's timeline through FY2016 in order to accommodate a lengthy procurement process that has resulted in the implementation period of several ICAA II mechanisms extending through September of 2016. All of the SO objectives under ICAA II remain as stated in LAC-IEE-10-30, which determined a Categorical Exclusion and Negative Determination with conditions.

In addition to ICAA II, this SO includes field-based and Washington program staff that contribute to the SO, as well as program support such as travel and environmental compliance training and guidelines. This SO also supports regional conservation initiatives such as workshops and analyses conducted by NGOs, academic institutions, and other organizations. The LAC/RSD/E office manages this SO with substantial input from the LAC bilateral and regional Missions. Prior to implementation of specific activities, work plans for activities in a given country are jointly reviewed and approved by USAID Mission and Washington staff.

The Strategic Objectives are to:

- Strengthen conservation systems such as national protected area systems, private and indigenous reserves;
- Organize efforts to address some of the most critical conservation initiatives in the region;
- Strengthen and expand the conservation network to include broader partnerships such as universities, NGOs specializing in areas other than conservation, and the private sector; and
- Ensure that adequate financing is available for conservation sustainability.

Within the context of these objectives, ICAA II will seek to continue building both financial support and institutional commitment and capacity for conservation in the Andean Amazon, across civil society organizations, the private sector and public agencies. ICAA II will be implemented through six to twelve cooperative agreements for geographically and/or thematically specific conservation activities in the region, one region-wide task order contract for program support, a Public International Organization mechanism, and a Leader with Associate award. Partners and specific activities under these mechanisms will be determined largely through a competitive process with the possibility of two to four direct grants anticipated to be awarded through unsolicited proposals. In addition ICAA II will be implemented through three or more USG IAAs, PASAs and/or PAPAs to provide technical assistance, analysis and capacity building activities.

Although particular activities have not yet been defined, some key themes have been identified. These include:

- Addressing the management needs of conservation and special use areas such as indigenous areas, communal reserves, private landholding, protected areas, etc. under various regimes of management or co-management of indigenous, traditional and other local stakeholders, government agencies and private landowners;
- Building capacity and commitment within civil society and government agencies for the development and implementation of effective public policies for conservation;
- Applying best practices for natural resource management in selected areas in partnerships that cross civil society, the private sector and public agencies; and
- Bringing innovative financial mechanisms to bear on the sustained implementation of these practices, policies and strengthened institutional capacities.

Recommended Environmental Threshold Decision

Categorical Exclusion/Deferral

Although specific activities under ICAA II have yet to be determined, a number of probable ICAA II activities would qualify for a categorical exclusion under 22 CFR 216.2 (c) (2) (i), “Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)”, 22 CFR 216.2 (c) (2) (iii), “Analyses, studies, academic or research workshops and meetings”, or 22 CFR 216.2 (c) (2) (xiv), “Studies, projects or programs intended to develop the capability of recipient

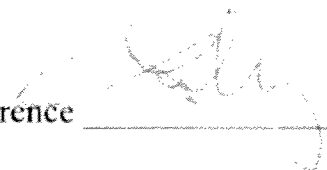

countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.).” A **Categorical Exclusion** is recommended for activities under ICAA that fall under the above categories.

For all activities under ICAA II that are not categorically excluded from additional environmental review, a **Deferral** is recommended until such time as these activities are better defined. Upon workplan review and approval by the AOTR, any implementation activities identified by the AOTR and/or the partner will be further examined. At that time, and prior to the implementation phase for such activities, an amended IEE shall be submitted for LAC BEO approval.

Under no circumstances will funds be used for: the procurement or use of pesticides; the purchase of equipment which could be used for commercial timber harvesting; nor activities, projects, or programs involving commercial timber harvesting unless the appropriate environmental assessment is conducted, and approved by the LAC Bureau Environmental Officer.

Concurrence _____ Date _____

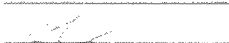

Lawrence Rubey, Director, LAC/RSD

Concurrence  _____ Date  _____

Lawrence Rubey, Director, LAC/RSD

Clearance Page for Initial Environmental Examination Amendment for ICAA II through FY2016

LAC/RSD	TPollard	clearance:	_____	date:	_____
LAC/RSD	GLestikow	clearance:	_____	date:	_____
LAC/RSD	CCushing	clearance:	_____	date:	_____

LAC/RSD	TPollard	clearance:	_____	date:	_____
LAC/RSD	GLestikow	clearance:		date:	9/20/11
LAC/RSD	CCushing	clearance:		date:	9/21/11

Drafted:CCampbell: Sept 19, 2011. Tel 712-4178 cocampbell@usaid.gov

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amendmt Sept 2011 ICAA II thru 2016

